

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

ANTHONY TRUPIA,

Plaintiff,

v.

HERITAGE HARD ASSETS LLC; KYLE PATTON,
individually as Manager/Officer of HERITAGE
HARD ASSETS LLC; HLV VENTURES, an
unregistered New York company; REAGAN GOLD
GROUP, LLC; STEVE FRANCIS, individually as
Manager/Officer of REAGAN GOLD GROUP, LLC;
WORLD HARVEST CHURCH, INC. ; ROD PARSLEY,
individually as Manager/Officer of WORLD
HARVEST CHURCH, INC.; SOUTH BAY GALLERIES
LLC; BRANDON MENDELSON, individually as
Manager/Officer of SOUTH BAY GALLERIES LLC;
TELNYX LLC; DAVID CASEM, individually as
Manager/Officer of TELNYX LLC; IAN EITHER,
individually as Manager/Officer of TELNYX LLC;
JAMES WHEDBEE, individually as
Manager/Officer of TELNYX LLC; MANDI MENA,
individually as Manager/Officer of TELNYX LLC;
ONVOY, LLC; BRETT SCORZA, individually as
Manager/Officer of ONVOY, LLC; JAMES HYNES,
individually as Manager/Officer of ONVOY, LLC; G
EDWARDS EVANS, individually as
Manager/Officer of ONVOY, LLC; MATTHEW
CARTER JR, individually as Manager/Officer of
ONVOY, LLC; LEVEL 3 COMMUNICATIONS, LLC;
JEFF STOREY, individually as Manager/Officer of
LEVEL 3 COMMUNICATIONS, LLC; ZEBERSKY
PAYNE SHAW LEWENZ, a Florida law firm;
ZACHARY D LUDENS, individually as an attorney
of ZEBERSKY PAYNE SHAW LEWENZ; and DOES 1
through 100, inclusive,

NO. CIV-24-498-SLP

FILED

JUN 24 2024

JOAN KANE, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY RP, DEPUTY

Defendants.

AFFIDAVIT IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT

I, ANTHONY TRUPIA, declare under penalty of perjury that he following facts are true and correct to
the best of my information and belief:

1. A complaint was filed on April 22nd, 2024 in Oklahoma State District Court. This case was removed to Federal District Court for the Western District of Oklahoma on May 15, 2024.
2. Summons were issued April 22nd, 2024, and mailed April 23rd, 2024.
3. Service on the following defendants was effected on the following dates:

REAGAN GOLD GROUP, LLC;	04/26/2024
WORLD HARVEST CHURCH, INC. ;	05/01/2024
SOUTH BAY GALLERIES LLC;	05/07/2024

4. The method of service was by delivery via United States Post Office Certified Mail.
5. The deadline for responsive pleading to the initial complaint and summons for each of the following defendants was originally:

REAGAN GOLD GROUP, LLC;	05/17/2024
WORLD HARVEST CHURCH, INC. ;	05/22/2024
SOUTH BAY GALLERIES LLC;	05/28/2024

However, because the case was removed to Federal Court on May 15th, the deadline was changed to 7 days after the notice of removal was filed if that deadline is longer or later than the original deadline, see Fed. R. Civ. P. 81(c). This made the deadline for responsive pleading for REAGAN GOLD GROUP, LLC May 22nd, 2024. The deadlines for WORLD HARVEST CHURCH, INC. and SOUTH BAY GALLERIES LLC remain unchanged at May 22nd, 2024 and May 28th, 2024.

6. More than (21) days have elapsed since REAGAN GOLD GROUP, LLC, WORLD HARVEST CHURCH, INC., and SOUTH BAY GALLERIES LLC have been served, and more than (7) days have elapsed since this case was removed to Federal District Court. 43 days have elapsed since REAGAN GOLD GROUP, LLC, WORLD HARVEST CHURCH, INC., and SOUTH BAY GALLERIES LLC were served and 38 days have elapsed since this case was removed to Federal District Court, and the defendants have failed to plead or otherwise defend as provided by the Federal Rules of Civil Procedure.
7. REAGAN GOLD GROUP, LLC, WORLD HARVEST CHURCH, INC., and SOUTH BAY GALLERIES LLC are incorporated entities or limited liability companies; none are minors, incompetent, or members of the military or active service. See Fed. R. Civ. P. 55(a).

Respectfully submitted,
/s Anthony Trupia
605 SE 21ST St.
Oklahoma City, OK 73129
516-984-0142
Trupiaar@gmail.com

Pro Se

Sworn to and subscribed before
me this ____ day of _____,
_____.

Notary Public